

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ADDENDUM TO CONFIDENTIALITY AGREEMENT
AND STIPULATED PROTECTIVE ORDER**

This addendum (this “Addendum”) to the *Confidentiality Agreement and Stipulated Protective Order* (Dkt. No. 825) (the “Protective Order”) is entered into by and among: (a) the debtors and debtors in possession (collectively the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”); (b) the Official Committee of Unsecured Creditors (the “Committee”); and (c) Robert J. Cleary, solely in his capacity as the court-appointed examiner in the Chapter 11 Cases (the “Examiner” and with each of the persons or entities in the foregoing clauses (a) through (c), the “Parties”).

Recitals

WHEREAS, on November 11 and November 14, 2022, the Debtors filed voluntary petitions under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”);

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

WHEREAS, on December 1, 2022, Andrew R. Vara, the United States Trustee for Regions 3 and 9 (the “U.S. Trustee”) moved for appointment of an examiner pursuant to section 1104(c) of the Bankruptcy Code (Dkt. No. 176);

WHEREAS, on March 8, 2023, the Court entered the Protective Order (Dkt. No. 832);

WHEREAS, on February 23, 2024, the Court entered an order directing the appointment of an Examiner (Dkt. No. 7909);

WHEREAS, on March 20, 2024, the Court approved the U.S. Trustee’s appointment of Robert J. Cleary as the Examiner (Dkt. No. 9882);

WHEREAS, the Parties wish to provide, and the Examiner wishes to have access to, documents marked “Confidential” and “Highly Confidential” pursuant to the terms of the Protective Order;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND, UPON COURT APPROVAL HEREOF, IT IS ORDERED that the following terms will supplement and modify the Protective Order and govern requests for and production and handling of Discovery Material:

1. The Parties shall submit this Addendum to the Court for approval. The Examiner shall abide by the terms of this Addendum and the Protective Order even if this Addendum is not entered by the Court for any reason, unless the Court orders otherwise.
2. The Examiner certifies and agrees that he has read and understands, and agrees to be bound by, the terms of the Protective Order (as defined therein).
3. Paragraphs 5, 6, and 7 of the Protective Order are hereby modified to provide that Confidential and Highly Confidential Discovery Material, and any and all information contained

therein, may be produced, given, shown, made available or otherwise communicated to the Examiner and his counsel and advisors in the Chapter 11 Cases.

4. Use of Designated Material in the Examiner's Report: Unless otherwise agreed by the Producing Person, all Designated Material included in the Examiner's Report that discloses Highly Confidential or Confidential Material, shall be filed under seal in accordance with the Federal Rules, the Bankruptcy Rules, and the Local Rules, such as by redacting Designated Material in the Report, and replacing exhibits that constitute Designated Material with a placeholder, and providing unredacted and complete copies of all such submissions to all Parties to this Order, to the United States Trustee, and to the Court; provided, however, that the Designated Material shall become public seven (7) business days after the filing of the Examiner's Report unless the Producing Person files an objection with the Court to the unsealing of the Designated Material. If an objection is filed, the Designated Material shall remain under seal until such time as either the Court determines whether the Designated Material shall remain confidential, or the parties reach an agreement on the unsealing of the Designated Material.

5. The provisions of this Addendum constitute an order of the Court and violations of the provisions of this Addendum are subject to enforcement and the imposition of legal sanctions in the same manner as any other order of the Court. The Court retains jurisdiction to interpret and enforce this Addendum.

Dated: March 26, 2024
Wilmington, Delaware

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